

**UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF DELAWARE**

Kendall Raye Rogers,	)	
Plaintiff	)	
	)	
v.	)	
	)	Case Number: 05-721
State of Delaware, Dept. of Public	)	
Safety/DMV,	)	
Defendant	)	

**ANSWER OF STATE OF DELAWARE,  
DEPT. OF PUBLIC SAFETY/DMV TO COMPLAINT**

1. Admitted.
2. Admitted.
3. Denied, in that the Division of Motor Vehicles is now part of the State of Delaware, Department of Transportation.
4. Denied.
5. Denied.
6. Admitted that no discriminatory practices occurred, or are continuing.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted that Plaintiff claims retaliation; denied that it occurred.
11. Denied.
12. Admitted.
13. Denied.
14. Denied.

**Affirmative Defenses**

15. The Complaint fails to state a claim upon which relief can be granted.
16. The Plaintiff executed a release and settlement of claims that may limit the potential relief that could be obtained in this Litigation.
17. Any personnel actions complained of by Plaintiff in the Complaint were not discriminatory within the meaning of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. Section 2000e et seq.

WHEREFORE, Defendant State of Delaware respectfully requests that this action be dismissed, with costs assessed against Plaintiff.

/s/ Frederick H. Schranck  
Frederick H. Schranck (ID #925)  
Deputy Attorney General  
Delaware Department of Justice  
P.O. Box 778  
Dover, DE 19903  
(302) 760-2020  
Attorney for Defendant  
Delaware Department of Transportation

DATE: November 9, 2005

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Kendall Raye Rogers,	)	
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Safety/DMV,	)	
Defendant	)	

**CERTIFICATE OF SERVICE**

The undersigned certifies that he/she has served the counsel of record with two true and correct copies of Answer of State of Delaware, Dept. of Public Safety/DMV to Complaint by placing same in the United States mail, postage prepaid on the 9th day of November, 2005 as follows:

Kendall Raye Rogers  
23 S. Kirkwood Street  
Dover, DE 19904

/s/ Frederick H. Schranck  
Frederick H. Schranck (ID #925)  
Deputy Attorney General  
Delaware Department of Justice  
P.O. Box 778  
Dover, DE 19903  
(302) 760-2020  
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